

NETWORK TELEPHONE

Documentation of Problems
Outlined in August, 2001
Presentation

CUSTOMER OUTAGES SAMPLE PROBLEMS

Informal complaint to Florida PSC August 21, 2000 regarding Pensacola DSL outages.

Informal complaint to Louisiana PSC June 18, 2001 regarding UNE-P conversion outages.

Informal complaint to FPSC June 20, 2001 regarding BST installing service for itself when an NTC order was pending.



June 20, 2001

Mr. Walter D'Haeseleer, Director
Division of Competitive Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

RE: Informal Complaint of Network Telephone against BellSouth

Dear Mr. D'Haeseleer:

Network Telephone (NTC) requests investigation of a situation involving BellSouth's service installation for a customer for itself, while Network Telephone's order for the same customer remained in pending facilities status with BellSouth (BST). We consider this a serious parity issue. The situation we outline is not isolated or unique, but in this particular instance we have documentation and an affidavit from the customer for the Commission's consideration.

Network Telephone placed an order with BST (PON 01032129201) to add three new lines for Gynecology and Obstetrics, which was an existing resale customer of NTC in Pensacola, Florida. We received a firm order confirmation from BellSouth on March 21 with a due date of March 26. On March 26 BST called NTC and advised that the technician could not complete the order, as additional cable was needed. On March 28 we were advised that the estimated completion date was April 30. NTC personnel spoke with the LCSC and were advised that they could not give us a better date but they would call if they were able to provide facilities more quickly than April 30.

On March 30, our customer (Susan Buckley, Office Manager with Gynecology and Obstetrics) called BST to complain about the delay in the installation of facilities for her additional lines and was told BST could not help her since she was an NTC customer. The customer called BST back later the same day and placed an order with BST for installation of the three lines. The customer did this with NTC's knowledge and approval. The customer advised us that the cable was run on April 3 and her service was connected on April 4. This connection was made in response to the customer's order placed by her with BST. NTC's order remained in pending status. BST's LENS system appears to confirm the connection dates, although BST provided different dates in its letter to us. Network Telephone cancelled its own order for the lines on April 9, after they had been activated for five days. We were never notified by BST that the facilities were available.

I'm sure you understand this situation raises serious parity issues for us. BellSouth gave itself preferential treatment. It installed an order for its own customer more quickly than it would install the same service for us. It failed to notify us that facilities were available 26 days earlier

Florida Public Service Commission
June 20, 2001
Page Two

than the due date it had provided us, even after we explicitly asked for an expedite and were told we would be called if anything was available more quickly.

I have attached an affidavit from Susan Buckley confirming the information contained in this letter. You will see that the information we received in the written response from BellSouth (attached) contradicts some of the information provided by Ms. Buckley and information from our own records. We believe our facts, and those provided by the customer, are correct.

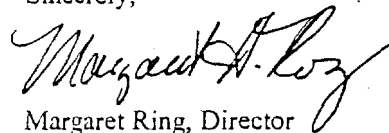
We would like assurance from BellSouth and the support of the Commission staff on the following points:

1. BellSouth will notify Network Telephone immediately if facilities become available prior to a previously provided due date.
2. BellSouth will provide service to Network Telephone at parity with the service it provides its own retail division.
3. BellSouth will provide Network Telephone with a means of escalating pending facilities issues at parity with the escalation procedures it apparently has in place for itself.
4. BellSouth will handle its orders on a first-in, first-out basis. If a Network Telephone order is placed prior to a BellSouth order for the same service and is not cancelled by Network Telephone, this order should be the first worked regardless of the circumstances or additional orders place.

We appreciate your consideration of this complaint, particularly with regard to the parity issue. I am also including an additional copy of this letter to be placed in the correspondence side of Docket 960786-TL, BellSouth's Petition for 271 Relief in Florida.

Thank you for your assistance.

Sincerely,



Margaret Ring, Director
Regulatory Affairs

cc: Docket 960786-TL

Encl: Affidavit of Susan Buckley
Response of BellSouth to NTC

AFFADAVIT REGARDING
TELEPHONE SERVICE CONNECTION
FOR GYNECOLOGY AND OBSTETRICS

STATE OF FLORIDA
COUNTY OF ESCAMBIA

Personally appeared before me, the undersigned, Susan Buckley, who, being first sworn according to law, deposes and states on oath that she is Office Manager of Gynecology and Obstetrics, that she personally handled the telephone service connections for the business in March and April of 2001, and that she is making this Affidavit in connection with Network Telephone's informal complaint before the Florida Public Service Commission against BellSouth.

Susan Buckley affirms the following to be true and correct statements to the best of her own personal knowledge and belief:

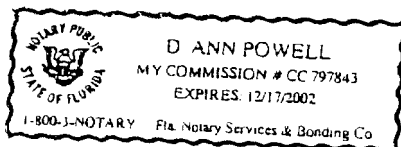
1. Gynecology and Obstetrics, 4900 Grande Drive, Pensacola, FL 2504 has been a telephone customer of Network Telephone since July, 1999.
2. Ms. Buckley placed an order on March 20, 2001 with Network Telephone for three additional telephone lines for Gynecology and Obstetrics.
3. Upon being informed by Network Telephone that there was a delay due to pending facilities with BellSouth, Susan Buckley contacted BellSouth to place an order directly with BellSouth for the service. This order was placed on March 30, 2001.
4. BellSouth called Susan Buckley on March 30, 2001 and told her they would clear the facilities the next week.
5. On April 3, BellSouth informed Susan Buckley they had installed enough cable for 20 lines and that they had installed the three new lines requested.
6. On April 4, 2001, the three new lines were working at the office of Gynecology and Obstetrics.
7. On April 4, 2001, Susan Buckley requested that Network Telephone convert these lines to Gynecology and Obstetrics' account with Network Telephone.

AFFIANT AFFIRMS THE STATEMENTS ABOVE AND FURTHER SAYETH NOT:

Susan L. Buckley

Sworn to and subscribed before me this
19th day of June, 2001.

D. Ann Powell
Notary Public





BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

May 9, 2001

Mr. Mitch Dantin
Network Telephone, Incorporated
815 South Palafox
Pensacola, Florida 32501

Dear Mitch:

This is in response to the conference call of April 11, 2001, between BellSouth and Network Telephone (NTC). During the call NTC raised an issue regarding BellSouth's intervals when an order has been placed in a pending facility (PF) status.

I understand from the conference call that NTC sent Purchase Order Number (PON) 01032129201 to BellSouth to switch the local service for Gynecology Obstetrics from BellSouth to NTC and to also add three additional lines to the service. On March 26, 2001, BellSouth informed NTC that the order had been placed in a PF status. The estimated completion date (ECD) for the construction of the additional facilities was April 30, 2001.

In addition, I also understand that on March 30, 2001, Gynecology Obstetrics placed an order with BellSouth's Business Systems. According to NTC, Gynecology Obstetrics was given a due date of April 4, 2001 by BellSouth. Further, according to NTC, the end-user elected to cancel the order with NTC. The three lines that were added by BellSouth Business Systems for Gynecology Obstetrics were 850-474-4787, 850-474-1486 and 850-474-9201.

Following are the results of BellSouth's investigation:

On March 26, 2001, a BellSouth technician was dispatched to the Gynecology Obstetrics location to install the three additional lines ordered by NTC, only to discover that the order had incorrect cable and pair assignments. There were no available facilities at this location for the additional lines. The technician referred the order to the engineering group to have additional facilities installed and the order was placed in a PF status.

On March 27, 2001, the engineering group began to size the job. Due to the numerous activities involved such as, looking at the pole lines, cable, checking whether there were pole permits, etc., it appeared that the construction job for the facilities would require a great deal of time to complete, therefore, an ECD of April 30, 2001 was provided to NTC.

The job bid was given to Truvance, a BellSouth contractor. The expected completion date for the cable to be in place was April 23, 2001.

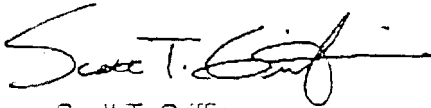
On March 30, 2001, Gynecology Obstetrics called BellSouth Business Systems (BBS) to place an order for the three additional lines. The BellSouth ordering system provided a due date of April 4, 2001, however, the system also immediately placed the order in a PF status.

On April 3, 2001, Truvance was dispatched on the construction job and discovered that the amount of work involved to complete the job was not be as involved as first estimated.

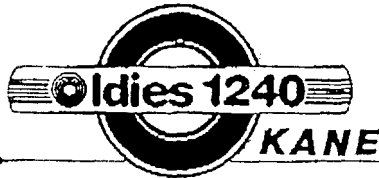
On April 9, 2001, the construction work to add new facilities was completed by Truvance. The three additional lines ordered by Gynecology Obstetrics were installed on April 9, 2001, after the construction work was completed. On April 9, 2001, BellSouth received a request from NTC to cancel PON 01032129201.

I trust the above information satisfies your concerns. If you have additional questions, please feel free to call me at 205-321-4958.

Regards,

A handwritten signature in black ink, appearing to read "Scott T. Griffin", with a stylized flourish at the end.

Scott T. Griffin
Regional Account Manager
BellSouth Interconnection Services



2316 East Main Street • New Iberia, LA 70560

(318)•365•3434 • FAX•(318)•367•5385

July 6, 2001

Commissioner James M. Field
Louisiana Public Service Commission
One American Place, Suite 1510
Baton Rouge, LA 70825

Dear Commissioner Field:

I am writing to file a complaint with the Louisiana Public Service Commission against BellSouth. BellSouth's handling of a service order involving KANE Radio resulted in a lengthy service outage to the station and borders on gross negligence.

I elected to move my service from BellSouth to a competitor, Network Telephone. Network Telephone issued its order to BellSouth to provision my service through what I understand is called UNE-P. It has been explained to me that this involves BellSouth issuing a disconnect order and an "N" or new order for the service, although no physical change in facilities is made. These orders are supposed to be worked at the same time so the customer doesn't have any problems.

BellSouth did not work the orders together and as a result KANE Radio had approximately 20 hours of service outages on June 14, 2001, during which time callers received a "not in service" recording on our lines. Network Telephone appeared to do everything possible to resolve the problems and get BellSouth to restore this service. Each time, the service would be restored, and then be disconnected again. It was absolutely inexcusable.

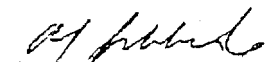
It is very frustrating to have to deal with this gross negligence. This whole scenario has occurred because BellSouth has (opened its lines to competition), however, when we decided to try the competition we were faced with this service disruption and embarrassing "not in service" message on our lines which have been in operation since 1982. BellSouth.net even disconnected my e-mail account after the conversion, although I had not ordered a change in the account. They said this was done, "because they didn't have a means of billing me." This is patently ridiculous. BellSouth has managed to bill me for many years and BellSouth.net could either use the same address or contact me to confirm a billing address. It is amazing that the Yellow Page advertising division could quickly find an address to bill me for my monthly advertising.

I don't know if BellSouth is trying to subtly, or not so subtly, harass customers who choose a different carrier. It was very embarrassing to hear that my telephone "had been disconnected". Now my business has suffered from their negligence.

Please investigate the situation involving KANE Radio and take whatever steps are appropriate to prevent the problems I experienced from happening to anyone else.

Network Telephone has advised me it has had a number of similar situations involving Louisiana customers and intends to compile them to present to the Commission also. I certainly hope that the Commission will take BellSouth to task for such inept handling of a relatively simple transaction.

Respectfully,


Art Suberbielle
President & General Manager



June 18, 2001

Lawrence St. Blanc, Secretary
Louisiana Public Service Commission
One American Place
Baton Rouge, LA 70825

RE: Informal Complaint of Network Telephone Against BellSouth Regarding
Service Outages on UNE-P Conversions

Dear Secretary St. Blanc:

Last week Network Telephone had three instances in Louisiana in which BellSouth incorrectly worked orders for UNE-P conversions, causing extensive service outages for the business customers involved. Network Telephone has been told by each of the customers that they have filed complaints with the Louisiana Public Service Commission against BellSouth over the problems. Network Telephone also wants to file a complaint regarding the service outages experienced by these customers.

Although BellSouth has indicated both to us and to the Commission that its processes have been corrected so the "N" and "D" orders associated with UNE-P conversions are being worked together, this is not the case. The three customers converted last week had outages totaling approximately 66 hours. The customers included a law office and a radio station. Callers received a "not in service" recording which implied that the customer either no longer existed or had service disconnected for nonpayment. I'm sure you can understand that no business can tolerate this type of treatment.

Attached is a summary of the problems for each customer. Your assistance in investigating each instance is requested. Network Telephone advocates a change in BellSouth process so these orders can flow through as "C" (change), orders, since no physical disconnection of facilities is really necessary. We, as a competitor, and you as representatives of customers in Louisiana, cannot continue to use and approve processes that result in this type of disruption of telephone service.

Thank you in advance for your consideration.

Sincerely,

Brent McMahan, Vice President
Regulatory Affairs

cc: Account Team, BellSouth
UNE-P User's Group, BellSouth
Broussard, Bolton, Halcomb and Vizzier
KANE Oldies Radio
Supreme Specialties

Attachment One
Informal Complaint of Network Telephone
June 18, 2001

Louisiana Customer Outage Details

318 487-4589 Broussard, Bolton, Halcomb & Vizzier, 912 5th St., Alexandria, LA 71301

BST issued two disconnect orders with only one associated N order to convert on 6/13.

CAUSE: BST did not process LSR request properly.

APPROXIMATE OUTAGE TIME: 9 hours

985 851-7465 Supreme Specialty, 401 Roland Rd., Houma, LA 70363

BST issued an N and D order to convert on the due date of 6/13 then cancelled and reissued both because the N order PF'd. The second D order completed on 6/13 and the customer was out of service. The second N order noted that it required a dispatch to get it to work. We repeatedly called the LCSC and left a message about the problem but never got a response. I notified the OAVP in the LCSC of the problem at 1:PM EDT. I advised him that the order did not require a dispatch. The pairs had been changed on the conversion and AFIG needed to be told to change them back to the originals so that the customer's service would work without a BST technician visit. He referred it to the LCSC center support manager. The hunting was not working so the LCSC then had to issue a C order to try to get the hunting to program correctly through RCMAG. The customer got his service back about 4:45PM EDT on 6/14. As of 6/15, the N order is still in the pending status in CSOTS.

CAUSE: BST issued order incorrectly and/or downstream OSS systems did not work properly.

APPROXIMATE OUTAGE TIME: 36 hours

337 364-9956 Supreme Specialty (Same customer as above but in different location)

Converted on 6/13. Original N order went PF and BST cancelled and reissued the D and N orders. The D order completed on 6/13 but the cable pairs were changed on the N order and the customer was out of service all day. BST advised at 6PM on 6/13 that lines were all working but that was because the customer had Call Forwarding Don't Answer and his calls were going to voice mail. I advised them that the customer wasn't answering because the calls were ringing open and that the cable pairs needed to be referred to LFACS to be changed back to the original ones. The LCSC told us they were changed because the pairs were in a SLC. I told them that a SLC does not affect a conversion to UNE-P. Two lines were omitted from the N order and a C order had to be issued on 6/14 to add back those lines. It does not appear that the charges were waived on that C order even though the LCSC issued it under the same PON as the N. Both the N and C orders showed that they needed to be dispatched out. As of 6/15 those two orders do not show completed in CSOTS. Customer was finally in service on 6/14.

CAUSE: BST issued order incorrectly and/or downstream OSS systems did not work properly.

APPROXIMATE OUTAGE TIME: 21 hours

337 365-3434 KANE Radio, 2316 E. Main, New Iberia, LA 70560

N and D conversion orders were due on 6/13. When the D order completed on 6/13 the customer went out of service. The N order noted that it required a dispatch to work because the cable pairs on all 6 numbers had changed. The LCSC changed the appointment on the N order to 6/14 but the customer was already out of service. I called the LCSC and advised them that the order should not be dispatched on but that they must get the cable pairs changed back to the original ones. The customer was back in service at 8:30 pm EST ON 6/14.

CAUSE: BST issued order incorrectly and/or downstream OSS systems did not work properly.

APPROXIMATE OUTAGE TIME: 20 hours

STATE OF FLORIDA

Commissioners:
J. TERRY DEASON, CHAIRMAN
E. LEON JACOBS, JR.
LILA A. JABER
BRAULIO L. BAEZ



DIVISION OF COMPETITIVE SERVICES
WALTER D'HAESELEER
DIRECTOR
(850) 413-6600

Public Service Commission

October 2, 2000

Mr. Brent McMahan
Vice President, Regulatory & Governmental Affairs
Network Telephone Corporation
815 S. Palafox
Pensacola, Florida 32501

Re: Digital Subscriber Line (DSL) Service to Pensacola End-users

Dear Mr. McMahan:

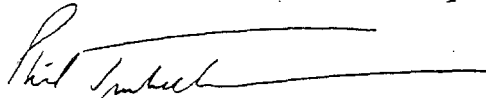
This is in response to your August 21, 2000 letter about BellSouth's provision of DSL service to your end-users served by its Bayou Boulevard remote terminal. You wrote of multiple, constant interruptions from March through August 2000, and asked that BellSouth provide a permanent solution.

We forwarded your concerns and letter to BellSouth, asking that it expedite its investigation of your end-users' problems. BellSouth's September 12, 2000 response (enclosed) details the results of its investigation. It first reset and systematically replaced common electronics in the remote terminal and its 5000 Grande Drive central office to restore service and attempt to resolve the troubles. It then found on August 15, 2000 that the DSL failures were caused by AC Power alarms at the Grande Drive central office and backup batteries that failed to carry the load causing all the central office equipment to fail. When the AC power was restored, only the DSL circuits failed to restore normally. BellSouth reports that it installed new backup batteries on August 30, 2000. It also referred the power problems to Gulf Power, who completed the replacement of faulty buried power feeder cables in the Bayou Boulevard area on September 6, 2000. By telephone on September 27, 2000, BellSouth reported that it has verified that all service in its Grande Drive central office is working properly. It apparently also checked with your company on September 19, 2000 and found that your DSL lines were working properly.

Mr. McMahan
Page 2
October 2, 2000

Since BellSouth appears to have fully resolved your concerns and DSL troubles, we are closing your inquiry. Thanks for bringing your concerns to my attention. If you have questions or additional concerns, please call me at 850/413-6592.

Sincerely,

A handwritten signature in dark ink, appearing to read "Phil Trubelhorn", is written over a horizontal line.

Phil Trubelhorn, Engineer
Bureau of Service Quality

Enclosure

File: TL720, CATS #332297T



BellSouth Telecommunications, Inc. 850 222-1201
Suite 400 Fax 850 222-8640
150 South Monroe Street
Tallahassee, Florida 32301

Nancy H. Sims
Director - Regulatory Relations

September 12, 2000

Mr. Phil Trubelhorn
Florida Public Service Commission
2450 Shumard Oaks Boulevard
Tallahassee, Florida 32301

RE: Network Telephone Pensacola, FL

Dear Mr. Trubelhorn:

This is in response to your request of August 24, 2000, for an investigation with a written explanation of the interruptions of service experienced by Network Telephone Corporation (NTC) end user's in the Pensacola, Florida area. Following are the results of BellSouth's investigation:

A review of the trouble reports for NTC's Digital Subscriber Line (DSL) services in the Bayou Boulevard area in Pensacola by BellSouth's Network Operations personnel reveals there were service problems at that location.

The trouble reports received from NTC began March 21, 2000. An analysis of BellSouth's records shows that not all of NTC's DSL customers in the Bayou Boulevard area were out of service at the same time. On some occasions three of the DSL circuits failed and at other times five or eight of the circuits failed.

There were also periods of ten days to two weeks when no failures occurred in the area. It is also important to note that this same site provides Digital Signal 1 (DS1), Digital Data (DS0), Integrated Services Digital Network (ISDN), as well as, business and residential dial tone services on common facilities. BellSouth has not had reported failures of these services in the March 2000 to August 2000 time frame. The point is that the ISDN circuits use exactly the same electronics as the DSL circuits except the ISDNs are connected to the switched network and the DSLs are connected to NTC's Digital Subscriber Line Access Multiplexer (DSLAM).

2000 SEP 13 10:00 AM

2000 SEP 13 10:00 AM

2000 SEP 13 10:00 AM

Mr. Phil Trubelhorn
September 12, 2000
Page 2

Consistent throughout the investigation was the finding that the DSL circuits were the only circuits failing and they were only failing at BellSouth's 5000 Grande Drive central office location. 5000 Grande Drive provides service to the Bayou Boulevard area. BellSouth dispatched to the Grande site and found all services except some of the DSL circuits working. The DSL circuits trouble was alleviated if the NTC customer's equipment was reset or if the BellSouth channel unit at 5000 Grande Drive was reseated. During this period of time BellSouth systematically replaced common electronics in the central office as well as the remote terminal at 5000 Grande Drive in an effort to completely resolve the trouble.

Unfortunately, the problems on the DSL circuits continued. As a result of the trouble reports from NTC, BellSouth's attention focused on the multiplexers that were on the fiber ring feeding the Grande Drive site. No system common problems were found. Much of the testing, verification, and electronics replacement were accomplished during early morning hours, 1:00 AM to 5:00 AM, in order to reduce the impact on other customers in that area. The local BellSouth personnel were also working with BellSouth's Region Technical Support for Data Services and Digital Loop Carrier.

The source of the trouble was finally found on the afternoon of August 15, 2000 as a result of a trouble report received from NTC on August 11, 2000. A review of central office alarms indicated an AC power alarm had occurred at the Grande Drive on August 11, 2000. The float voltage of the back up batteries was verified at Grande Drive, as well as, the output voltages of the primary and backup rectifiers and all tested OK. It appeared that the DSL circuits went down during the same time frame that an AC power alarm was activated at the Grande site by the BellSouth Network Reliability Center.

On the afternoon of August 15, 2000, the BellSouth's Digital Electronic Support Specialist and the Special Services Installation & Maintenance Network Manager visited the Grande site where the AC power was purposefully failed. The result was that the backup batteries would not carry the load causing all of the equipment to fail at the site. The AC power was quickly restored and all services restored normally with the exception of the DSL circuits.

New batteries to supply backup power at the 5000 Grande Drive Remote Terminal were ordered on August 17, 2000 and installed on August 30, 2000. This should resolve the problem with the failing DSL circuits even if power outages continue. Additionally, a trouble was referred to Gulf Power, the local power provider, on August 18, 2000 to resolve the AC power problem. Gulf Power found a faulty buried power feeder that affected several of its customers in the Bayou Boulevard area. Gulf Power has completed the placing of the new power cables. The Gulf Power Engineer has advised that all customers have been moved to the new power lines and all work in the area was completed on September 6, 2000.

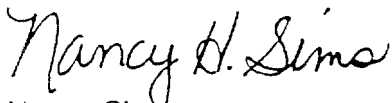
Mr. Phil Trubelhorn
September 12, 2000
Page 3

BellSouth's Network Operations personnel will follow up on September 19, 2000, to verify that all service in the Grande central office is working properly.

The information contained herein is considered customer proprietary information by BellSouth and should be kept confidential until such time as the customer permits release of the information.

Should you have further questions, please do not hesitate to call.

Sincerely,

A handwritten signature in cursive script that reads "Nancy D. Sims".

Nancy Sims
Director – Regulatory Relations

(21)

**CSI UPDATE ISSUES, CLARIFICATIONS,
MISCELLANEOUS PROVISIONING SAMPLE PROBLEMS**

Complaint to Florida PSC February 17, 2000

Matrix of problems sent to BST in July 2000. BST responses in bold.

Letter to Marcus Cathey, BST, September 12, 2000 requesting assistance on continuing problems and answers on BST procedures. No response received.

Letter to Bill French, BST, May 25, 2001, requesting written documentation of CSI update time.

Bill French response June 11, 2001.

Mitch Dantin letter to Bill French on same issue 6/13, 2001. No response received.



June 13, 2001

Mr. William French
BellSouth Interconnection Services
600 North 19th Street
9th Floor
Birmingham, Alabama 35203

RE: CSR Update Issues

Dear Bill:

I am in receipt of your letter dated June 11, 2001 to Margaret Ring in response to her request for written confirmation of the CSI update intervals discussed in the conference calls with Network Telephone. Your statement "I am not sure how or where Network Telephone got the impression that BellSouth has a 30-day standard interval to update a CSI" has taken me quite by surprise and is frankly unbelievable.

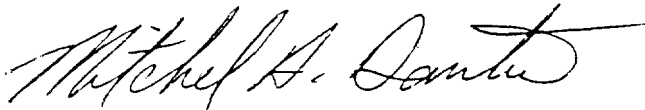
We have discussed this issue with BellSouth repeatedly. Network Telephone has pushed for a firm answer to BellSouth's time interval for updating a CSI due to us experiencing extreme delays in getting updated CSIs. After having consulted with the AVP of the LCSC, Bill Thrasher, during our May 24, 2001 conference call, you clearly stated that BellSouth's interval for updating a CSI was 30 days. There were eight Network Telephone employees who can confirm this, of which three are vice presidents and one is our chief information officer. At this point, we asked for a confirmation of this interval in writing, and you asked that we make our request in writing. This is what prompted Margaret's letter. At no time did you state that the 30-day interval to update a CSI was only for those files that were placed into an error status. There was no misunderstanding on our part.

Network Telephone can work with the 24-48 hour standard interval you have now given us, with an understanding of the escalation process that we may follow in the event it exceeds that time. However, as we have discussed, receiving the CSI update in a timely manner is of utmost importance to us as our ability to begin billing our customers is dependent upon it. It is an interval we will continue to monitor.

We have seen what appears to be a BellSouth problem. The problem being, not consistently updating a CSI within the 24-48 hour interval, since we began processing orders as a CLEC in 1998. This has been brought to our account team's attention on numerous occasions since that time. How would you suggest we proceed with getting the problem corrected within BellSouth? Do we need to work this issue through the Change Control Process or is our only recourse through the Regulatory process?

As our BellSouth Account team representative, I am seeking your guidance on how to proceed with continuing problems on CSI updates. I also trust that you will come to better understand the impact these issues have on our business. I would appreciate a response by June 29, 2001. Thanks for your assistance.

Sincerely,

A handwritten signature in cursive script, reading "Mitch A. Dantin". The signature is fluid and stylized, with a long horizontal flourish extending from the end.

Mitch Dantin, Vice-President
Order Management

cc: Margaret Ring



BellSouth Telecommunications, Inc.
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

william.french2@bellsouth.com

Bill French
Sales Director
CLEC Interconnection Sales

205 321 4970
Fax 205 321 4343
Pager 877 850 8791

June 11, 2001

Ms. Margaret H. Ring
Network Telephone Company
815 South Palafox Street
Pensacola, Florida 32501

Dear Margaret:

This is in response to your letter dated May 25, 2001, regarding the interval for BellSouth to update a Customer Service Record (CSR) after an order activity has occurred. I am not sure how or where Network Telephone got the impression that BellSouth has a 30-day standard interval to update a CSR. As we have discussed with you and others at Network Telephone during the weekly conference calls, BellSouth's objective is to update an order to the CSR within 24-48 hours.

As previously discussed, there may be an occasion when it may require more than 48-hours for an order to process through the various systems and update the CSR. I did share with Network Telephone that if an error or errors occur on a service order, additional time may be required to resolve the error and update the CSR. BellSouth strives to have an error corrected and update completed to the CSR prior to the close of a bill cycle.

I hope this explanation clears up any misunderstanding that may have existed concerning the update of a CSR. Please feel free to call me at 205-321-4970, if there are additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill French", written over a horizontal line.

Bill French
Sales Director



May 25, 2001

Mr. William French
BellSouth Interconnection Services
600 North 19th Street
9th Floor
Birmingham, Alabama 35203

Dear Mr. French: *Bill*

As we discussed on our conference call yesterday, Network Telephone is requesting written confirmation from BellSouth Telephone that the interval for a CSI to update is 30 days. This interval is not published, and we are requesting written documentation of the verbal information we were given.

I would appreciate a response to this request no later than June 5, 2001.

Thanks for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Margaret H. Ring', with a stylized flourish at the end.

Margaret H. Ring, Director
Regulatory Affairs

cc: Mitch Dantin



NETWORK TELEPHONE

NOW YOU HAVE A CHOICE

September 12, 2000

VIA OVERNIGHT MAIL

Mr. Marcus B. Cathey
Sales Assistant Vice President
BellSouth
CLEC Interconnection Sales
600 North 19th Street, 9th Floor
Birmingham, Alabama 35203

Dear Mr. Cathey:

We have had an ongoing problem with provisioning issues, and provided individual documentation of those problems to BellSouth. Scott Griffin has sent responses to the individual problem areas we have documented, and Bill French has suggested that we need to find a better way to address the issues we have encountered since reviewing each problem on a case-by-cases basis. We certainly agree on this point.

After reviewing BellSouth's most recent responses to the individual cases, which included acknowledgement of BellSouth problems and system errors on a number of occasions, I would like some information from you on what action BellSouth plans to correct the following global problems:

1. Number Assignment Problems – While we understand that “no telephone number is guaranteed until dial tone is provided,” there appears to be a system problem on number assignment. When the number is already assigned to another customer or CLEC, it apparently continues to appear as available to be reserved. Why can't numbers be removed from the “available” list once they have been assigned or reserved by another customer? If the number is then not actually connected for some reason, it could be returned to the list.
2. CSI Updates – There are numerous instances of “order had to be manually completed, error status, unable to determine.” Is there an internal BellSouth procedure to process CSIs in a more timely fashion when there is an error or when the CSI hangs up for some reason and has to be done manually? What percentages of your CSIs are not updated within the required intervals?
3. Clarified in Error – We continue to experience clarifications in error, which you acknowledged on your report. What type of process is in place at BellSouth to reduce clarifications in error? Do you track the number or percentage of clarifications in error?

BST ?

Marcus, Cathey
BellSouth
September 12, 2000
Page Two

4. Missed Due Dates and Outages – Many of these are attributed to LCSC errors. Are the number or percentage of LCSC errors tracked? What internal procedures are in place to reduce or eliminate these errors?
5. In the specific case of Premier Paint, this customer does still have service with Network Telephone, but also has a line with BellSouth. The BST line was added after we could not get a timely response from BST for the addition, and the customer went with BST for the new service, while keeping existing lines with NTC. This furthers our argument that we do not receive equal treatment. Please take a look at this account again and provide a report on this situation.

We continue to track and document individual BST provisioning problems on a daily basis. Rather than continuing to inundate you with this information, we want to try to get answers on a system-wide basis for the continuing problems. I look forward to your response on these larger issues by September 19, 2000. As you may be aware, we have also requested a meeting to discuss these and other problems. We want to have your response in hand prior to a meeting on this subject.

Should you not respond or be unable to provide some assurance to us that we will not continue to encounter these difficulties over and over again, we will have no choice but to present the general problems, and our specific documentation, to the respective Public Service Commissions and ask for their intervention.

Sincerely,



Brent McMahan
Vice-President, Regulatory and Governmental Affairs

Diane Brasfield,
Vice-President, OM and Provisioning

CC: Scott Griffin
Bill French

NETWORK TELEPHONE PROBLEMS WITH BELL SOUTH ORDER PROCESSING
SAMPLES FROM MARCH, APRIL AND MAY, 2000

NUMBER ASSIGNMENT PROBLEMS				
NAME	ST	PON	BTN	DETAIL
Grase, Olivia	FL	00032816-04	850-747-9426 (FOC) 850-747-9426	NTC reserved number, placed order, FOC showed reserved number, NTC found number assigned to another CLEC and BST had to give new number. Telephone number was assigned to another customer with application date of 4-7.**No telephone number is guaranteed until dial tone is provided.
Kornegay, Deloise	MS	00427216-02 00424457-01	601-991-0163 (FOC) 601-992-3839	NTC reserved number, PON due date 4/28, initial order rejected "assignable order" due to BST "run time error", and number reserved already a working number. Order resubmitted and given due date of 5/3. (BST expedited the due date at our request) Telephone number was assigned to another customer with application date of 4-20.**No telephone number is guaranteed until dial tone is provided
Buckner, Emma	FL	004175051000	601-829-3393 (FOC) 601-829-2796	NTC reserved number. 4/20 FOC gave due date 4/25 with reserved number. On 4/26 BST said number was taken and we would have to resubmit order. BST gave new connection date of 4/27. Order worked 4/27. Telephone number was assigned to another customer with application date of 4-12.**No telephone number is guaranteed until dial tone is provided
Morgan, Debra	FL	000328216-06	850-785-2739 (FOC) 850-626-6828	Order placed 3/28, FOC shows assignable order. BST said the number we reserved was given to another CLEC. FOC dated 3/31 still shows incorrect number. BST confirmed new number in 3/31 fax. Order was worked on 3/30. Telephone number was a designated Quick Serve number and should not have been assigned. Telephone number had to be changed to provide dial tone **No telephone number is guaranteed until dial tone is provided
Lee, Ardanian	FL	000328216 Invalid PON Correct PON 000328216-10	850-626-7763 (FOC) 850-626-6781	Received FOC and completion notice showing reserved BTN. Order worked 3/30. However, a new BTN was assigned, and was not provided to NTC until 3/31. Telephone number on LSR was 850-522-1822, not 850-626-7763. Order would not complete with telephone number 850-626-7763. Number had to be changed to provide dial tone.**No telephone number is guaranteed until dial tone is provided
Network Telephone	FL	000317033006	504-466-1375	Order placed 3/17. FOC received 3/20 with 3/21 due date. 3/31 NTC checked on order not completing and BST said the installed number was different from the number on the FOC, and gave the installed number at that time. **No information available. Order gives no indication that number was changed.**No telephone number is guaranteed until dial tone is provided
Rathel, Denise	FL	000502024000	850-539-4863 (FOC) 850-539-7234	5/2/ LENS down so NTC did paper order using a quick serv number. Clarified on 5/3 saying number was currently in service. Ver 01 sent 5/4 to assign new number. BST said did not receive. Resent 5/5. Received FOC 5/8 due 5/11. Worked 5/11. **No information available. Order gives no indication that number was changed.**No telephone number is guaranteed until dial tone is provided

CSI DOES NOT UPDATE				
Rental City	LA	000429rey02	337-334-7368	FOC due date of 5/3. CSI did not update until 5/15 and we could not verify order 12 days to update. **Order had an error on it and the order cannot complete until error clear. Error in directory section of order. Error cleared and accounting posted complete 5-15.
Avery Clinic	FL	00042538701	850-470-8430	FOC due date of 5/12. Called BST on 5/25 as CSI had not updated and we could not verify order had been worked. BST said it was "hung up in the system." CSI updated on 5/26. Order had been worked on 5/12. 14 days to update. **This was a correction order to correct an N order. This order could not post until the N order posted. The N order was in error and the errors had to be cleared.
Town of St. Martinville	LA	00412366-11	337-M31-8366	FOC due date of 4/18. Checked with BST on 5/3 and told the order was still showing "pending." CSI updated on 5/10, showing order worked on 4/18. 22 days to update. Order hung in system and had to be manually completed.

CSI DOES NOT UPDATE (continued)				
Acadia Parish	LA	991129041000	337-788-8800	FOC due date of 1/11/00. CSI did not update until 4/18/00 after numerous escalations. NTC could not confirm correct order for 3 months. 97 days to update. **Very large account with a high volume of activity. From December to April this account had over 11 C orders issued. Most of the orders were Sequenced and CRO'd together. In the middle of the C orders more than 6 record orders were issued. When orders are Sequenced and CRO'd together they do not complete until all orders that are Sequenced and CRO'd together complete.
Acadiana Medical	LA	0051129203	337-948-6446	Disconnect worked 5/12. CSI did not update until 5/15. BST indicates it is a LENS problem with no fix available. 3 days to update. **Unable to locate a D order for this number. Number is a live account.
Wilkes, Harry	FL	00042434102 Invalid PON Correct PON 000424341-02	850-479-9630	Order to bring customer to NTC submitted 4/24 with due date of 4/24 on FOC. The order did not post due to a BST processing error. Order posted 5/2. Eight day delay before we could confirm customer's order had been correctly worked. **Unable to determine cause of delay.
Green, James	FL	000424341-05	850-436-6626	Order placed 4/24 with due date of 4/27. CSI did not update until 5/9. Twelve day delay before we could confirm customer's order had been correctly worked. **Unable to determine.
Jimenez, Ricardo	FL	000419-340-02	850-539-7906	Order placed 4/19 with FOC date of 4/20. Order was worked but system did not update until 4/28 due to LENS error. Eight days to confirm order. **Unable to determine.
Myrick & Davis	FL	000420341-03	850-433-0084	FOC date of 4/20. CSI did not update until 4/28 due to an error in the system. Eight days to confirm order **Unable to determine.
Anderson Rug	MS	000405341-02	601-264-0304	Order placed 4/5 with due date of 4/10. Completed 4/10. CSI updated 4/12 and showed usage package left off each line. BST said would correct 4/12. LENS problem would not allow adding usage packages. BST finally forced addition on 4/14. CSI updated to show

				addition on 4/18. Eight days to final resolution. **Previous C orders issued were in error. Errors corrected and a C order canceled before this order could post complete.
Total Quality Realty	FL	000505341-01	850-939-8488	Order placed 5/5, worked 5/9. Called BST to confirm order and was told it was complete and CSR would update within 24 hours. CSR updated 6/16. 5/16. Seven days. **Unable to determine error
Werstler, Ronald	AL	000403341-05	334-602-4917	Order placed 4/3, worked 4/10. CSI did not update until 4/17. 7 day delay. **Order in error status. Error had to be cleared before could post complete.
Norwalk Service	MS	000411341-01	601-264-4966	Order placed 4/11, worked 4/14. CSI did not update until 4/24. 10 day delay. ** Error had to be cleared before could post complete.
Morgan, Debra	FL	000328216-06	850-769-6828	Order placed 3/28. Order was worked on 3/30. CSI did not update until 4/4. Seven days to confirm order. **Order would not work with assigned telephone number that was on order. Telephone number had to be changed to complete the order and the order had to be corrected before it could post complete.(Refer back to complaint number 4 on sheet 1)
BST NOT PROVIDING EQUAL SERVICE TO CLEC				
Exit Realty	FL	0051703300	850-994-7744	Customer requested new numbers with specified NXXs. LENS would not allow us to reserve the numbers. Bell gave her the numbers "in less than 10 minutes" and we lost the customer. **This Customer is still a customer of Network Telephone. Unable to locate where customer left Network Telephone.
Premier Paint	MS	000412277-03	601-482-7246	Placed order 4/12, FOC received 4/14 with due date of 4/19. Lost customer. BST installed for customer on 4/17. **This customer is still with Network Telephone. Order shows that Network Telephone canceled this order. Order was scheduled within standard due date interval.
CLARIFIED IN ERROR				
Weems Community	MS	00030626507	601-483-4821	3/6 order for an additional directory listing. Multiple invalid clarifications resulting in 24 days for the order to be processed. NTC has extensive documentation of various problems. **Order canceled and new order issued 3/30 under PON 00032826501.
Kelly & Cabell	MS	00051726501	601-795-6949	Request for telephone directories returned, saying must go through BAPCO. Called BST and they agreed clarification was in error, and worked the order. **Clarified in error.

CLARIFIED IN ERROR (continued)				
Chemeil, Ellen	MS	00042829212	601-264-2529	Order for transfer of service placed 4/28 with requested due date of 5/2. On 5/2 BST clarified for a listing error on DLR. Verified in CLEC ordering guide that the clarification was in error. FOC issued 5/3 with due date of 5/8. CSI did not update until 5/15. Six day

				not involve jacks. BTC corrected order with a completion date of 5/16. One day delay. **Clarified in error.
Rule, Adarian	FL	00033126502	850-433-2352	Placed order 3/31 with FOC due date of 3/31 to add/delete features. On 4/5 there was no CSI update and BST said the order hadn't completed and they would work it 4/5. Order was worked 4/5 but 4/7 CSI indicated it was completed 3/31. Five day delay. **No delay in service the order was worked on 3-31, CSR posted 4-4-00
Beavers, Matt	FL	0050929204	850-995-9846	FOC due date 5/12 for service transfer. Transfer not completed until 5/15. Three day delay. **Unable to determine why original T&F order canceled. Orders canceled and reissued.
National Motorist Association	MS	00031626508	228-863-1647	FOC due date of 3/21 to delete usage package 1 and add usage package 2. 3/22 order listed as complete - pkg. 1 deleted but pkg. 2 not added. BST said would correct. Checked on 3/27 and correction not made. Escalated. 3/30 still not corrected. 4/3 customer record indicated pending status. Order completed on 4/5 and posted on 4/6. However, FOC shows completion date as 3/21 the date to which BST said it would adjust billing. Two week delay. **System error.
Magee, Katherine	MS	00031026503	228-864-7377	FOC due date of 3/15. Completed, but usage package2 was not on CSI. BST said would correct. On 3/17 posted as completed, but usage package 1 was added instead of package 2. On 3/20, the CSI showed both usage packages added. ON 3/21 the order was finally corrected. Six day delay. **System error
Old City Bldg.	FL	00032126504	850-432-7723	FOC due date of 3/24 to delete lines from hunt sequence. Order was not worked until 4/03. Nine day delay. ** Delay due to HUNTING on the order. Correction order to correct records issued.
Our Lady of Fatima Catholic Church	LA	00031526501	337-232-8945	Customer requested change to non-pub with no transfer of calls message. FOC due date 3/17. On 3/20 the old number was referring calls. BST said FOC date was wrong and the order would be worked on 3/20. On 3/21 correct message was on the line. Four day delay **LSR incorrect. LSR did not indicate to make Non-Pub, only mention of no reference of calls was in RMKS of LSR. Not on LSR. SUPP sent in on 3/20 (due date of order) cannot supp on Due Date.
Cruisetime & Tours	FL	000411277-03	850-438-1912	FOC due date 4/18. NTC checked on 4/26 as CSI had not updated. BST advised that the due date was changed to 4/25 because the number wasn't in the wire center and a corrected FOC should have been sent. Received corrected FOC on 4/26 with new number and completion date of 4/25. CSI updated 4/27. Seven day delay. **If CSOTS had been checked they would have seen that the order had not completed and called the LCSC to question. Unable to determine if FOC resent.
Gulf Coast Bank	LA	000405033005	337-M31-8782	FOC due date 4/12 for conversion as is. Order worked 4/24. CSI updated 4/28. 12 day delay on order, 4 day delay on CSI. **Due date missed due to Bellsouth error. If CSOTS had been checked the LCSC could have been notified before this long of a delay.
Computer Horizons	MS	00042429203	601-583-2727	FOC due date 4/26. CSI updated on 4/28 and a feature was not added as ordered. Called

				BST and the feature was added on 4/28. CSI updated on 5/1. 2 day delay. **LCSC error, feature not added to order. If CSOTS had been checked would have seen feature left off.
MISSED DUE DATES (continued)				
Fast Signs	FL	000504341-01	850-477-9744	Order placed 5/4 for switch as is. Checked on order 5/9 and BST said there was a problem in the system and they would try to work the order. Order worked on 5/10. Six day delay. **Records indicate order issued on 5-10-00 and due 5-10-00. LCSC error
Dubroc, Tracey	LA	00050129203	318-563-9533	Order placed 5/1 for transfer of service. FOC due date 5/8. Order not worked. BST said FOC due date was type and it should have been 5/9. Called customer on 5/10 and she still did not have service. BST worked on 5/10. CSI indicates incorrectly that the order was worked on 5/9. Two-day outage beyond FOC date. **Order was SD until 5-10-00 for CF. Bellsouth tried call CBR to notify without success.
OUTAGES				
Palmer, Monica	FL	0051226503,04 Incorrect PON 00051226503	850-505-0370, 0821	FOC due date of 5/17 for both PONs. Customer reported no dial tone on 5/17. It appears the PONS were not worked together. BST resequenced to flow through together. Service outage to customer - 8 hours. **LCSC error. Failed to CRO orders together. Could have been detected in CSOTS.
Keltner, Veronica	FL	00050329201	850-475-1789	Order submitted 5/3 to change to non-pub and add voice mail. Due date 5/5. BST issued the customer a new number instead of making change. NTC escalated and problem was corrected on 5/5. Also, voice mail was not connected until 5/8 - 3 days late. **Bellsouth did not change number. **LCSC error issued as R order instead of C order. Feature has to be installed on C order.
Image Development	FL	000504277-05	850-934-7823	Order worked 5/8 with incorrect call forwarding number. BST acknowledged the order was worked incorrectly and said order would have to be cancelled and reworked. New FOC issued with 5/10 due date. Two-day outage. **LCSC error, transposed CFN number when typed.
Innerlight Surf	FL	000329226504 Incorrect PON 00032926504	850-932-5134	Placed order for new install with hunting on 3/29. Received FOC on 4/4 with 4/7 due date. On 4/10 NTC received notification of pending facilities with new due date of 5/10. BST did not return calls from 5/3/ to 5/9. On 5/9 hunting was worked in the switch, causing 1 st line to roll over to 2 nd line, which had not been installed. Line was not installed until 5/12. CSI updated 6/2. 43 days for new line, 3 days outage due to hunting problem, 21 days for CSI to update. **NTC reserved telephone number 850-932-4558 on 3/25. LSR submitted with this number on 3/29. On 3/27 telephone number 850-932-4558 was assigned to another customer. IN FLORIDA AND OTHER STATES IN CERTAIN CO's A SHORTAGE OF NUMBERS EXIST. The order had to have another telephone number assigned. Part of order delay was CF for cable pair. Central Office did work on 5/9 instead of 5/12.